

EXHIBIT “B”

K7MKUFOC

1 actual documents and not a spreadsheet that was created. I
2 just want to clarify.

3 THE COURT: Okay. No, and that actually does matter.

4 I guess what I'm asking is --

5 MS. SAINT-FORT: Also --

6 THE COURT: Yes, go ahead.

7 MS. SAINT-FORT: -- there were no open allegations
8 that were included as well.

9 THE COURT: Okay. But I guess I'm trying to
10 understand the format in which these materials were produced.
11 Are we talking about -- I've seen CCRB complaints in electronic
12 form. Were those being produced with certain categories
13 blocked out? Because what I'm seeing, and I'm seeing
14 everything, but for the things that were produced to the
15 New York Civil Liberties Union, was it the very complaint
16 document with certain things blacked out or something else?

17 MS. SAINT-FORT: No, it was something else. It is an
18 officer history form, I believe is what it may be referred
19 to -- I'm not sure of the exact name, excuse me, your Honor --
20 but it would detail the complaints that were made, the category
21 of the complaints, none of the underlying information of the
22 complaint or factual information of the complaint, and just the
23 officer's name, precinct, as well as their rank.

24 THE COURT: I see.

25 Do you happen to know when this production was made?

K7MKUFOC

1 MS. SAINT-FORT: Yes, I do. It was made on July 13th.

2 THE COURT: Thank you.

3 Other than that particular production, and the OATH
4 documents that you mentioned earlier, are there other materials
5 that have been disclosed?

6 MS. SAINT-FORT: There may have been other materials
7 that were disclosed earlier through individual FOIL requests,
8 but I don't know the specifics of when those disclosures were
9 made or who the requester was.

10 THE COURT: Okay. I understand.

11 Tell me, please, about what is contemplated. What I'm
12 trying to understand -- I don't want to beat around the bush
13 about this -- I'm trying to understand whether productions will
14 be reactive in the sense that someone has to ask in order to
15 get these materials, or, more proactive, for example, is
16 someone setting up a website with all of the materials that are
17 the subject of this lawsuit.

18 MS. SAINT-FORT: It is contemplated that certain
19 disclosures will be proactive and that there will be a website
20 that can be accessed by the public. The type of information
21 that will be included differs depending on the agency.

22 THE COURT: Well, tell me, please: Have decisions
23 been made, or are these still subject to discussion?

24 MS. SAINT-FORT: There is still some discussion that
25 is being -- there's still some discussion about it, as to how

K7MKUFOC

1 MR. DUNN: I do. It was July 9th.

2 THE COURT: July 9th? Okay.

3 When, if you recall, did you receive it?

4 MR. DUNN: I believe we received the response to the
5 official city portal late in the morning of the 14th.

6 THE COURT: Okay.

7 Sir, this is the part where you might be telling me
8 you're unable to answer me. Were you the point person for this
9 FOIL request?

10 MR. DUNN: I was.

11 THE COURT: Did you have conversations with folks at
12 CCRB, or the Corporation Counsel's Office, or the City of New
13 York prior to filing your formal request on the 9th of July?

14 MR. DUNN: There was a process that happened on that,
15 your Honor.

16 THE COURT: Okay.

17 MR. DUNN: The CCRB had a public board meeting on
18 Wednesday, July 8th. I routinely attend CCRB board meetings.
19 I've done so for many, many years.

20 THE COURT: Yes.

21 MR. DUNN: The CCRB did a demonstration of essentially
22 a portal it was going to create and make public, and they did a
23 sort of screen sort of exercise about that. And there were
24 hundreds of people -- I think there were a couple of hundred,
25 150, people participating in that meeting. I don't know if